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18 *Attorneys for the Defendant Cadence Design
Systems, Inc.*

20 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO / OAKLAND DIVISION

22 AHMED HIGAZI, on behalf of himself
and a class of those similarly situated,

Case No. C 07-2813 MJJ

23 Plaintiff,

**STIPULATION AND [PROPOSED]
ORDER TOLLING FLSA CLAIMS**

24 v.

COLLECTIVE ACTION

25 CADENCE DESIGN SYSTEMS, INC.,

CLASS ACTION

26 Defendant.

DEMAND FOR JURY TRIAL

1 WHEREAS, plaintiffs asked defendant to produce a computer readable list of the names
2 and last known addresses of the group of persons defined in paragraph 9 of the Complaint as the
3 “Nationwide FLSA Collective Plaintiffs,” in order to gather information from those persons and
4 to inform those persons that the statute of limitations on FLSA claims continues to run until one
5 submits a consent to join claim;

6 WHEREAS, defendant is not prepared to produce such a list at this stage in the litigation,
7 but recognizes that plaintiffs will have more flexibility in working out a mutually acceptable
8 discovery and motions schedule if the FLSA statute of limitations is tolled;

9 The Parties, through their counsel of record, hereby stipulate and agree as follows:

- 10 1. The statute of limitations on the FLSA claim of the Nationwide FLSA Collective
11 Plaintiffs shall be tolled from August 27, 2007 through the later of (1) the end of
12 the opt in period set by any order granting *Hoffmann* notice; or (2) the date of any
13 order of the Court denying *Hoffmann* notice and denying the production of names
14 and addresses;

15 2. This stipulation is without prejudice to plaintiffs moving for *Hoffmann* notice or to
16 compel the names and addresses, or to defendant opposing such motions;

17 3. This stipulation is without prejudice to plaintiffs seeking broader tolling, or to
18 defendant opposing broader tolling.

19 | Respectfully submitted,

21 || Dated: August 22, 2007

By:

James M. Finberg

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11 Dated: August 21, 2007

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24 *Attorneys for the Defendant Cadence Design*
25 *Systems, Inc.*

26 ORDER

27 The forgoing stipulation is approved, and IT IS SO ORDERED.
28

Dated: _____

29 Hon. Martin J. Jenkins
30 United States District Judge